

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Various Petitions for Rulemaking Seeking)	RM-10867
Changes to the Commission's Part 97)	RM-10868
Amateur Radio Service Rules)	RM-10869
)	RM-10870
To: The Commission)	

Via the ECFS

**COMMENTS OF RICHARD L. TANNEHILL IN RESPONSE TO THE PETITIONS
FOR RULEMAKING IN RM-10867, RM-10868, RM-10869 AND RM-10869**

1. I have been a licensed amateur radio operator since 1961, and have held an Extra class license since 1966. I have been involved as a professional engineer in public safety and homeland security communications at the State level for over 30 years, and involved in private consulting, for 23 years. Over the last 14 years, I have worked with many youth in an Explorer Post in the Phoenix area who have become involved with amateur radio, and have witnessed the dramatic decline in amateur HF activity in the past decade, even though the license numbers have not fallen as dramatically as many predicted. I believe that this phenomenon is due to the "graying" of the amateur population, as older hams move into managed property areas where antennas are not allowed. Hence, the lack of radio traffic on amateur HF bands is very noticeable today.

2. I believe that much of this lack of interest has had to do with the requirement for a code test to access HF frequencies, as was previously required under S25.5 of international law. Even with a reduction to 5 wpm for all licenses, many youth would rather spend time learning computer technology, than studying code. Another problem is the lack of a true "entry" class license, such as the Novice was back in the 1950's- 1970's. A short 20 question, non-technical exam, enabled us to access several HF bands, and even a portion of 2 meters for awhile to get a sampling of VHF "phone" operation. Aside from the code, a person could study for a day or two and be ready for that entry level Novice exam. Although the Technician class license does not

require a code test, it's syllabus is rather rigorous for an entry level license. The current "Now You're Talking" manual from the ARRL contains over 270 pages of study material, including the question pool. This is more effort than most of today's youth are willing to expend for an entry trial into a hobby they don't even know if they will like. It is particularly difficult to attract youth to amateur radio, when virtually any Pentium class computer (or Apple) can be on the internet with a \$25 modem, free Windows Internet Explorer, and a \$10/month internet account. People can then join worldwide chat rooms at no additional charge, and without studying months for a license to do so, or restrictions on which countries one may talk to. Clearly, there is an unbalance in the current license structure.

3. I believe that the ARRL and NCVEC have worked hard to come up with plans to address this unbalance in the difficulty level of our current license structure. Although both have their merits, the ARRL plan appears to have somewhat greater appeal for several reasons.
4. In these comments, I will briefly address each of the current petitions in turn.

THE ARRL PETITION (RM-10867)

5. The American Radio Relay League ("ARRL") filed a Petition for Rulemaking (designated RM-10867 by the Commission), seeking sweeping – and progressive – changes to the Commission's Part 97 ARS rules, including:

- the creation of a new entry level license class with meaningful and attractive privileges designed to make the ARS more attractive to newcomers and reduce the number of "dropouts" resulting from the extremely limited privileges of the current de facto entry class license;
- a consolidation of the license structure to eliminate "orphaned" license classes
- some rearranging of the frequency privileges granted to its proposed remaining three license classes;
- and the elimination of a Morse test requirement for the General class license.

6. ARRL, did, however, propose to keep the existing 5 wpm Morse test requirement for the Extra class license.

7. I oppose the ARRL petition's proposal to keep the existing 5 wpm Morse test requirement for the Extra class license.
8. In another earlier-filed petition, RM-10786, No-Code-International made compelling arguments for the complete elimination of ALL Morse test requirements for all classes of ARS license issued by the Commission – arguments that are based in large part on the Commission's own previous determinations that Morse test requirements serve no legitimate regulatory purpose, do not comport with the basis and purpose of the ARS, and are, therefore, not in the public interest.
9. However, within the remainder of the ARRL petition, I find most other proposals that I believe have much merit and wish to conditionally support.
- However, in particular, I would agree to one-time instant upgrades of Technician class licensees to General class, and Advanced class to Extra class, if, and only if, the Commission finds that it is necessary to immediately convert the FCC's amateur database files to no more than 3 classes. Other options would be a "phase-in" period, of say 10 years for Technicians to upgrade to General, or become entry level (Communicator class) licensees, or simply letting old Technician and Advanced licenses stay on the books until their ultimate expiration. There is simply no other fair means to move to only three classes instantly beside instant-upgrades. I consider this issue the weakest point of the ARRL plan.

THE NCVEC PETITION (RM-10870)

10. The NCVEC petition makes the following distinctions from the ARRL plan.
- The NCVEC petition mandates “commercial only” transmitters for the new beginner class. (I disagree with this aspect of the plan. Many youth would be deprived of the privilege of the learning experience of transmitter construction techniques as we Novices of 40 years ago did)
 - The NCVEC petition mandates only low voltage (under 30 volts) powered transmitters for the new beginner class. (I disagree with this aspect of the plan. This eliminates all tube-type transmitters which are available at low cost at hamfests, and would make the cost of HF operating for an entry level licensee prohibitive)

- The NCVEC petition suggests a unique call sign identification for the beginner class. (I agree with this aspect of the plan; it will help older amateurs to "elmer" the newcomers)
- NCVEC recommends that all applicants for an Amateur license be required to certify that they have read and understand the FCC (Part 97) rules as part of the application process. (I agree with this aspect of the plan. All amateur should know the rules, and not claim ignorance as an excuse for improper operations.)
- The NCVEC petition proposes expanding HF voice spectrum 1025kHz (1.025MHz) more than the ARRL petition and, conversely, reduces exclusive CW/Data HF spectrum by the same amount. (I disagree with this aspect of the plan. We need to reserve some future spectrum for the experimentation and growth of digital technologies)

**THE RADIO AMATEUR FOUNDATION PETITION (RM-10868) AND THE PETITION
OF RONALD D. LOWRANCE (RM-10869)**

11. The Petitions for Rulemaking filed by the “Radio Amateur Foundation” (RM-10868) (“the RAF etition”) and Ronald D. Lowrance (RM-10869) (“the Lowrance petition”), unlike the ARRL petition and the NCVEC petition, seem devoid of any truly progressive and beneficial proposals for restructuring of the Commission’s Part 97 ARS rules.

12. In fact, their major thrusts seem to be to either substantially maintain the status quo – or worse, to attempt to revise history and roll the calendar backwards – in ways that would clearly not serve the public interest or be in the best interest of the future of the ARS, and should therefore be rejected.

SUMMARY AND CONCLUSIONS

13. I believe that the ARRL petition, *with the exception of its proposal to retain a 5 wpm Morse exam requirement for the Extra class license, which I strenuously oppose*, should be supported, with the condition about instant class upgrades as described above.

14. The NCVEC petition proposes to eliminate all Morse testing for all license classes, and for that more progressive proposal on this matter I commend the NCVEC.

15. However, on the other, non-Morse-related aspects of the NCVEC petition, my views are more mixed – in some cases favoring the difference in the NCVEC petition and in some cases opposing the difference.

16. I oppose both the RAF and Lowrance petitions and believe that they should be summarily denied as regressive, rather than progressive.

17. I sincerely hope that a truly comprehensive NPRM will be expeditiously forthcoming from the Commission that will provide an opportunity for further comment on the ARRL/NCVEC differences and that the Commission will act swiftly to eliminate unnecessary Morse testing requirements from its Part ARS rules, undertake to create a new entry class of license with meaningful frequency privileges in the HF bands.

Respectfully submitted,

Richard L. Tannehill, P.E.

Richard L. Tannehill, P.E. - W7RT
5410 W. Diana Ave.
Glendale, Arizona, USA
(623)930-7507
w7rtrick@firstinter.net